

(Caption of Case)

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

Town of Irmo

Petitioner

VS

Blue Granite Water Company  
Respondent

RECEIVED

2019 DEC 11 PM 4:04

SC PUBLIC SERVICE  
COMMISSION

DOCKET

NUMBER:

209 - 290 - 45

(Please type or print)

Submitted by: S. Jahue Moore

SC Bar Number: 4063

Address: 1700 Sunset Boulevard  
West Columbia, SC 29169

Telephone: 803-796-9160

Fax: 803-791-8410

Other:

Email: jake@mthlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

## INDUSTRY (Check one)

- ☐ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☐ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other: \_\_\_\_\_

## NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input type="checkbox"/> Letter                            | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer                    | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Complaint                 | <input checked="" type="checkbox"/> Petition to Intervene  | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |
| <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

Print Form

Reset Form

STATE OF SOUTH CAROLINA  
PUBLIC SERVICE COMMISSION

Town of Irmo	)	
	)	
Petitioner,	)	
	)	PETITION TO INTERVENE
vs.	)	
	)	
Blue Granite Water Company,	)	
	)	
Respondent,	)	
	)	
	)	

Petitioner Town of Irmo (“The Town”), by and through counsel, hereby moves to intervene in the proceeding whereby the Respondent, Blue Granite Water Company (“Blue Granite”), seeks a rate increase for its services to The Town. The grounds for the Motion are set forth below.

Blue Granite is a utility company that provides water and sewage services to The Town for a monthly fee to The Town’s residents. The company originally provided water and provided sewage treatment services, however, upon information and belief, Blue Granite no longer treats any sewage but rather is connected to the City of Columbia’s sewage system and the sewage passes through. Despite this reduction in actual services, Blue Granite is seeking permission from the Public Service Commission to increase its monthly rate charged to the citizens of The Town.

The Town has a substantial interest in this matter as it has a duty to protect its citizens and to provide for their general welfare. Additionally, The Town has a responsibility to protect property values within The Town’s limits. Accordingly, The Town has proper standing to challenge any rate increase requested by Blue Granite.

The rate increase requested is arbitrary and unreasonable as it will constitute an unreasonable burden on the citizens of The Town and will affect property values both within and

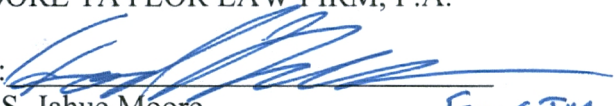
outside of The Town's limits. Currently, Blue Granite charges every citizen in The Town the same rate per month no matter how much water the citizen uses throughout the month. The rate is substantially higher than the rates in surrounding municipalities and cities which are serviced by other providers. Blue Granite has a recorded history of charging exorbitant rates to the citizens of The Town for no reason other than to maximize profit.

Going hand in hand with the unreasonable burden placed upon the citizens of The Town, the property values within The Town have been and will continue to be substantially affected by the higher rates. Charging higher rates within The Town has the effect of reducing property values to those properties while increasing the property values of properties outside of The Town which are subject to lower rates.

Based on the foregoing, The Town petitions to intervene in these proceedings and assert its right and duty to protect its citizens and property. Blue Granite has a history of providing substandard service while charging unreasonable rates, depressing The Town and preventing economic growth. The Town believes that any increase in rates for services provided by Blue Granite will only continue this negative impact and thus objects to any increase whatsoever.

MOORE TAYLOR LAW FIRM, P.A.

BY:

  
S. Jahue Moore  
1700 Sunset Boulevard  
P. O. Box 5709  
West Columbia, SC 29171  
(803) 796-9160

*For STM*

West Columbia, South Carolina  
December 11, 2019